



VIA ECFS

November 15, 2019

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Protecting Against National Security Threats to the Communications Supply Chain
Through FCC Programs, **WC Docket No. 18-89**

Dear Ms. Dortch,

On November 14, 2019, Alexi Maltas of Competitive Carriers Association met with Umair Javed, Legal Advisor, Wireless and International to Commissioner Jessica Rosenworcel. Separately, Mr. Maltas, along with Monica Akin, General Counsel, Viaero Wireless, met with Bill Davenport, Chief of Staff & Senior Legal Advisor for Wireless and International to Commissioner Geoffrey Starks.

In the meetings, we reiterated the points that CCA made in its November 13 ex parte letter.¹ In particular, we emphasized that we want to work with the Commission on a path forward to ensure the security of our nation's communications networks. We expressed our concern, however, that certain language in the draft Order that would seem to prohibit carriers from being able to "maintain," "operate," or "support" their networks with USF funds could have an immediate adverse effect on networks and consumers. Carriers must be able to engage in the day-to-day maintenance and operation of their networks or else consumers may lose connectivity and be unable to make calls, including 911 calls. For these reasons, we encouraged the Commission to remove the language in the draft that suggests that carriers cannot use USF funds for the maintenance, support, and operation of their networks.² We also noted that some, but not all, carriers may be able to use non-USF funds to maintain their networks, and the Commission should not foreclose that possibility.

Please contact the undersigned with any questions.

¹ See Letter from Alexi Maltas, Competitive Carriers Association, to Marlene H. Dortch, FCC, WC Docket No. 18-89 (filed November 13, 2019).

² See Draft Order paras. 26, 61, 64, 66, 68, 69.



Sincerely,

/s/

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CC: Umair Javed
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